

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 12-10027-WGY

(1) AMIE ARESTANI;
(2) RUDY AVALOS;
(3) DENNIS R. BRADY, JR.;
(4) ADOLFO CASTILLEJA,
A/K/A "RUDY";
(5) DAVID GURULE;
(6) CARL LINDSTROM; and
(7) STACY DEVANNEY
Defendants.

MOTION TO UNSEAL

The United States of America, by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby moves that this Court unseal the United States' *Ex Parte* Motion for Restraining Order; the Memorandum of Law in Support of United States' *Ex Parte* Motion for Restraining Order; and the Restraining Order, which were filed in connection with this instant criminal case on March 22, 2012.

The United States initially sought to impound these filings for a brief period because premature disclosure of these documents could lead to efforts by the owners to transfer, place liens upon, deplete, or otherwise impair the forfeitability of the real properties identified in the Superseding Indictment as forfeitable. On March 24, 2012, the United States District Court endorsed the government's Restraining Order with respect to the following:

- (a) the real property more particularly described as Lot 420 of Tract No. 5506 in the City of Hesperia, County of San Bernardino, State of California, as per map recorded in Book 67, pages 15-23, inclusive of Maps, records of said County
Parcel ID: 0411-421-04;
- (b) the real property more particularly described as Lot 142 of Tract No. 5581 in the City of Hesperia, County of San Bernardino, State of California, as per map recorded in Book 67 pages 63-74, inclusive of Miscellaneous Maps, in the Office of the County Recorder of San Bernardino County
Parcel ID: 0398-177-17; and
- (c) the real property more particularly described as the north one-half of Lot 140,

Tract 4608, Western Woods of Hesperia, Unit No. 2, as per map recorded in Book 57 of Maps, Pages 100-102, inclusive, records of San Bernadino County, California

Parcel ID: 0414-122-52-0.

The Restraining Order, as well as a Notice of *Lis Pendens* pertaining to each of the above described real properties, were recorded in San Bernardino County, California, in the appropriate recording office on April 4, 2012. Certified copies of the Restraining Order and copies of the Notices of *Lis Pendens* were sent to Melanie Santoyamartinez, Adolfo Castilleja, and John L. Littell, Esquire, on April 4, 2012, via certified mail.

The United States hereby requests that this Court unseal all of the documents that were filed on March 22, 2012 in connection with this instant criminal case so that they may be promptly served upon any and all interested parties and their attorneys, along with any other individuals and/or financial institutions having or believed to have an interest in the real properties that are subject to forfeiture.

WHEREFORE, the United States requests that the Court unseal all of the documents filed on March 22, 2012 in connection with this instant criminal case.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney,

By: /s/ Veronica M. Lei
VERONICA M. LEI
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Date: April 4, 2012

APPROVED AND SO ORDERED:

WILLIAM G. YOUNG
United States District Judge
Date: _____, 2012